

May 8, 2012

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: WC Dockets 09-197 and 11-42, Compliance Plan of Conexions, LLC**

Dear Secretary Dortch:

Pursuant to the Commission's recent Lifeline Reform Order and Public Notice, attached please find the compliance plan of Conexions, LLC ("Conexions").<sup>1</sup>

Conexions requests expedited approval of its Compliance Plan as it intends to participate in the Commission's broadband pilot program, described in the Lifeline Reform Order.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "T. Biddix".

Thomas E. Biddix

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<sup>1</sup> *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 et al., Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012); *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, Public Notice, DA 12-314 (WCB rel Feb. 29, 2012).

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications Carriers Eligible to	)	WC Docket No. 09-197
Receive Universal Service Support	)	
	)	
Lifeline and Link Up Reform	)	WC Docket No. 11-42
and Modernization	)	
	)	
Conexions, LLC	)	

**CONEXIONS, LLC COMPLIANCE PLAN**

Conexions, LLC, d/b/a Conexion Wireless (“Conexions”), respectfully submits its updated Compliance Plan to the Federal Communications Commission (“Commission”) to demonstrate that Conexions will abide by the new rules adopted in the Commission’s *Lifeline Reform Order*,<sup>2</sup> and in order to avail itself of the blanket forbearance from the “own facilities” requirement of section 214(e)(1)(A).<sup>3</sup>

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<sup>2</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice Of Proposed Rulemaking, FCC 12-11 (rel. Feb. 6, 2012) (“*Lifeline Reform Order*”). Conexions herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012)

<sup>3</sup> Conexions had previously been granted forbearance from the own facilities requirement. See *Telecommunications Carriers Eligible for Universal Service Support, Federal-State Joint Board on Universal Service, Conexions Petition for Forbearance*, WC Docket 09-197, CC Docket 96-45, Order, FCC 10-178 (rel. Oct. 1, 2010). It then filed a compliance plan on October 29, 2010. Subsequently, Conexions filed an amendment to its ETC Petition, which is currently pending before the Commission, seeking facilities-based status on the basis of its provision of operator services and directory assistance through its own facilities. See *Conexions, LLC d/b/a Conexion Wireless Amendment to Special Low-Income ETC Petition*, WC Docket No. 09-197 (filed Jan. 5, 2011). In light of the recent changes to the definition of supported services, Conexions hereby withdraws its January 5, 2011 amendment to its ETC petition and seeks to avail itself of the blanket forbearance provisions of the Commission’s *Lifeline Reform Order*.

Conexions respectfully requests expeditious approval of this compliance plan so that it may continue to provide essential Lifeline service to eligible low-income customers in states where it has previously been designated an ETC, and may provide service to additional eligible consumers in the various states for which it has pending ETC petitions.<sup>4</sup> Conexions commends the Commission's commitment to a nationwide communications system that promotes the safety and welfare of all Americans, including Lifeline customers.

**I. CONEXIONS INFORMATION:** Conexions, LLC d/b/a Conexion Wireless, is a Tennessee limited liability company, with headquarters in Melbourne, Florida. The sole managing member of Conexion Wireless is Thomas E. Biddix.<sup>5</sup> Conexions has no subsidiaries and operates under the name of Conexion Wireless.

Conexions began providing service in 2010 primarily for low-income households. Conexions now operates as ETC certified in Arkansas, Maryland and West Virginia. Conexions currently has a Petition pending before the Commission seeking ETC designation in nine states and foresees a vast expansion of operations with the Commission's approval of this Petition.

Conexions is financially capable of providing the Lifeline service in compliance with the Commission's rules. Conexions currently accepts Lifeline disbursements, but does not solely rely on this for financial stability. Conexions receives additional revenue from

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<sup>4</sup> Conexions currently has pending before the Commission a Petition for ETC designation in Alabama, Connecticut, Delaware, New Hampshire, North Carolina, New York, Tennessee, Virginia, and the District of Columbia. See *Comment Sought on Conexions LLC DBA Conexion Wireless Petition for Limited Designation as an Eligible Telecommunications Carrier in Several States*, WC Docket 09-197, Public Notice, DA 09-2368 (rel. Nov. 2, 2009). It also has petitions pending before various state public utility commissions as well. Conexions will file a revised Petition in the near future.

<sup>5</sup> Conexions Acquisition Group, LLC is a holding company that directly owns 100% of Conexions. Mr. Biddix directly owns 100% of Conexions Acquisition Group, LLC. Conexions Acquisition Group, LLC provides no services.

subscribers paying for services not included in the Lifeline subsidy in addition to Lifeline services. Conexions sells pre-paid plans to subscribers that are not enrolled in a government program or do not fall within Federal Poverty Guidelines.

Conexions is technically capable of providing Lifeline service. Conexions utilizes a proprietary software platform that controls all billing, payment, and provisioning matters, which has served it well in the states in which it currently operates. This system was created to administer both Lifeline and prepaid subscribers and both record types can be properly administered.

**II. LIFELINE SERVICE PLANS:** Conexions offers the following plan to Lifeline consumers: 100 minutes and a free mobile device at no monthly charge after applying the Lifeline \$9.25 discount. The plan includes voicemail, three way calling, call forwarding, caller ID, call waiting, nation-wide long distance, and calls to Conexions customer service are free of charge, provided the subscriber dials #611 or #4669 from his or her mobile device.

Additional rates and fees that may apply include the following: (1) any plan may have 200, 450, or 1000 minutes added for \$10, \$20, or \$30 respectively; (2) text messages are measured at one talk minute per text message sent or received. No roaming charges apply, and directory assistance and international calls are blocked at no additional charge to the consumer. Conexions will also provide traditional toll blocking for international calls to qualifying low incomes consumers at no additional charge in accordance with toll limitation service.

**III. ACCESS TO 911 AND E911 SERVICES:** As stated in the Commission's *Lifeline Reform Order*, forbearance is granted to the Conexions by "(a) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and availability of minutes; (b) providing its Lifeline subscribers with E911-compliant handsets and replacing noncompliant handsets at no additional charge to the subscriber."<sup>6</sup>

Conexions will comply with this ruling by providing eligible Lifeline customers access to 911 and E911 services upon receipt of handset. The Commission and consumers are hereby assured that all Conexions customers will have available access to emergency calling services at the time that Lifeline service is initiated, and that such 911 and E911 access will be available from Conexions handsets even if the account associated with the handset has not been activated or has no minutes remaining. Any non-compliant handsets will be replaced at no additional charge to subscriber.

Currently these 911 and E911 services are available to all Conexions subscribers. Conexions uses Verizon as its underlying carrier and Conexions 911 calls are routed in the same matter through Verizon networks as Verizon subscribers.

**IV. 47 C.F.R. § 54.202 CERTIFICATIONS:** The Public Notice requires carriers to include certifications required under newly amended 47 C.F.R. § 54.202, which applies to carriers seeking ETC designations from the Commission. Conexions hereby certifies that it will comply with the service requirements applicable to the support it receives. Specifically, Conexions' Lifeline services: (i) include voice telephony services that provide voice grade access to the public switched network or its functional equivalent; (ii) provide subscribers with a defined number of minutes of usage for local service at no additional charges; (iii)

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<sup>6</sup> See *Lifeline Reform Order*, ¶ 373.

provide subscribers with access to the emergency services provided by local government or other public safety organizations, such as 911/E911 to the extent the local government in Conexions' service area has implemented 911/E911 systems; and (iv) toll limitation for qualifying low-income consumers.

**V. LIFELINE ELIGIBILITY DETERMINATION:** Conexions will meet the terms with uniform eligibility requirements outlined in the new ruling of §54.409 of the Commission's rules and any additional requirements in the state that Conexions has designated ETC status. Pursuant to the Commission's *Lifeline Reform Order* section §54.409(a), the Conexions will ensure the subscriber meets at least one of the following criteria: (1) fall either at, or below 135% of the Federal Poverty Guidelines for the entire household; (2) participate in one of the following federal assistance programs: Medicaid, Supplemental Nutrition Assistance Program, Supplemental Security Income, Federal Public Housing Assistance (Section 8), Low-Income Home Energy Assistance Program, National School Lunch Program's free lunch program, or Temporary Assistance for Needy Families; (3) otherwise meet income-based eligibility criteria set forth by the state for its residents.

*Proof of Eligibility:* Conexions agrees to "check the eligibility of low-income consumers seeking to enroll in Lifeline either by accessing electronic eligibility databases, where available, or by reviewing documentation from the consumer demonstrating his/her eligibility for Lifeline service."<sup>7</sup> All personnel or third party contractors or agents (hereinafter "personnel") who interact with actual or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions

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<sup>7</sup> See *Lifeline Reform Order*, ¶ 91

about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists. In states where an eligibility database is not available, Conexions will examine each document provided as proof of eligibility and maintain records of subscriber's eligibility, but will not keep the documentation pursuant to the Commission's *Lifeline Reform Order* sections §54.410(b)(1)(ii) - (iii) and 54.410(c)(1)(ii)-(iii).

Acceptable documentation of program eligibility includes the current or prior year's statement of benefits from a qualifying assistance program, a notice or letter of participation in a qualifying assistance program, program participation documents, or another official document demonstrating that the prospective subscriber, one or more of the prospective subscriber's dependents or the prospective subscriber's household receives benefits from a qualifying assistance program.<sup>8</sup> Acceptable documentation of income eligibility includes the prior year's state, federal, or Tribal tax return; current income statement from an employer or paycheck stub; a Social Security statement of benefits; a Veterans Administration statement of benefits; a retirement/pension statement of benefits; an Unemployment/Workers' Compensation statement of benefit; federal or Tribal notice letter of participation in General Assistance; or a divorce decree, child support award, or other official document containing income information. If the prospective subscriber presents documentation of income that does not cover a full year, such as current pay stubs, the prospective subscriber must present the same type of documentation covering three consecutive months within the previous twelve months.<sup>9</sup>

*Subscriber Certifications.* Conexions awaits the Commission's upcoming nationwide database to certify all Lifeline applicants are qualified for Lifeline subsidy through either an eligible program

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<sup>8</sup> 47 C.F.R. § 54.410 (c)(1)(i)(B)

<sup>9</sup> 47 C.F.R. § 54.410 (b)(1)(i)(B)

or income based eligibility. Until this database's implementation, Conexions will continue to search available state databases and other methods of verification as described below.

Conexions' customers may apply through several different methods: by phone, facsimile, or through our online application. Every subscriber must return a state specific Lifeline form and eligible documentation submitted by mail, facsimile, electronic mail, or other electronic transmission prior to receiving.

Conexions collects the following information on its Lifeline application forms: (1) the subscriber's full name; (2) the subscriber's full residential address (P.O. boxes are not permitted); (3) whether the residential address is permanent or temporary; (4) the subscriber's billing address, if different; (5) the subscriber's date of birth; (6) the last four digits of the subscriber's Social Security number (or Tribal identification number if the subscriber is a member of a Tribal nation and does not have a Social Security number); (7) if the subscriber is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the subscriber, or his or her dependents, or his or her household receives benefits; and (8) if the subscriber is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.<sup>10</sup>

Conexions requires each prospective Lifeline applicant to certify, under penalty of perjury, that: (1) the subscriber meets the income-based or program-based eligibility criteria for receiving Lifeline; (2) the subscriber will notify Conexions within 30 days if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the subscriber no longer meets the income-based or program-based criteria for receiving Lifeline support, the subscriber is receiving more than one Lifeline benefit, or another member of the subscriber's household is receiving a Lifeline benefit; (3) if the subscriber is seeking to qualify for Lifeline as

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<sup>10</sup> 47 C.F.R. § 54.410(d)(2)



an eligible resident of Tribal lands, he or she lives on Tribal lands, as defined in 54.400(e); (4) if the subscriber moves to a new address, he or she will provide that new address to the eligible telecommunications carrier within 30 days; (5) if the subscriber provided a temporary residential address to the eligible telecommunications carrier, he or she will be required to verify his or her temporary residential address every 90 days; (6) the subscriber's household will receive only one Lifeline service and, to the best of his or her knowledge, the subscriber's household is not already receiving a Lifeline service; (7) the information contained in the subscriber's certification form is true and correct to the best of his or her knowledge, (8) the subscriber acknowledges that Lifeline is a non-transferable government benefit and that providing false or fraudulent information to receive Lifeline benefits is punishable by law and can result in fines, imprisonment, de-enrollment or being barred from the program; and (9) the subscriber acknowledges that the subscriber may be required to recertify his or her continued eligibility for Lifeline at any time, and the subscriber's failure to re-certify as to his or her continued eligibility will result in de-enrollment and the termination of the subscriber's Lifeline benefits pursuant to § 54.405(e)(4).<sup>11</sup> See Exhibit A – State Specific Lifeline Forms.

Annual Verification: Pursuant to the *Lifeline Reform Order* and § 54.410(f), Conexions agrees to re-certify all Lifeline subscribers by (1) querying the appropriate eligibility or income databases, confirming that the subscriber continues to meet the program- or income-based eligibility requirements for Lifeline and documenting the results of that review, or (2) obtaining a signed certification from the subscriber that meets the certification requirements set forth in § 54.410(d).

Conexions agrees to re-certify the eligibility of their Lifeline subscriber base as of June 1, 2012 by the end of 2012 and report the results to USAC by January 31, 2013 in accordance to

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<sup>11</sup> See section 54.410 (d)(3)

§54.405(e). Conexions agrees to de-enroll subscribers that do not respond to the annual verification or fail to provide proof of continued eligibility with 30 days.

Marketing and Disclosure Procedures: Conexions will comply with the Commission's marketing and disclosure requirements for participation in the Lifeline program. Conexions will include in its marketing materials language to indicate that (1) the service is a Lifeline service; (2) only eligible applicants may enroll; (3) Lifeline is limited to one member of the household at a time and is non-transferable; and (4) Conexions name. See Exhibit B – Sample Marketing Advertisement.

**VI. ADDITIONAL MEASURES TO PREVENT WASTE, FRAUD, AND ABUSE:** Conexions agrees to implement several procedures, in accordance to the Commission's *Lifeline Reform Order*, to ensure subscribers do not duplicate Lifeline benefits within a household or individual.

Address Verification: At the time of initial sign up, a new subscriber's address is validated for accuracy against the United States Postal Service ("USPS") database and saved in the USPS-approved format, which permits Conexions' subscriber database to more accurately prevent duplicates by avoiding variations of the same address from appearing multiple times in the database. Conexions cross-references all applicants against its own database, (by name, address, date of birth, last four of the applicant's social security number, etc.) to ensure the applicant is not currently in the system. If conflicting information is found to be the same address or consumer, the applicant is denied Lifeline benefits. Conexions also conducts manual reviews of its subscriber lists prior to filing its FCC Form 497s to ensure that it does not claim subsidies for any duplicate addresses.

Non-Usage Policy: Conexions has set in place a non-usage policy prior to the Commission's *Lifeline Reform Order*. Any handset that is not in use for a consecutive 30 days is de-enrolled. A

subscriber then has a 30-day window during which he or she may call Conexions and request re-enrollment. After a consecutive 60 days of non-usage, the account is closed. If customer decides to continue service in the future, the subscriber must be re-enrolled as a new subscriber, following all new subscriber guidelines and requirements.

### CONCLUSION

Conexions submits its Compliance Plan trusting it will fulfill the Commission's *Lifeline Reform Order*, the *Public Notice* and the Commission's rules and regulations of the Lifeline Program. Conexions respectfully requests the Commission to expedite the approval of this Compliance Plan so Conexions may continue to provide crucial Lifeline service to existing and upcoming subscribers in areas where Conexions has present ETC status.

Respectfully Submitted,



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Thomas E. Biddix  
Conexions, LLC  
Manager

## Exhibit A

# URGENT - MUST RETURN FOR BENEFITS

## Arkansas Lifeline Application Revised 04/20/12

Account Number: First Name: Last Name: M. Initial: Date Of Birth:  
Residential Address 1: Residential Address 2: Last 4 Of Social:  
City: State: AR Zip:

This is my (check one):

☐ Permanent Address ☐ Temporary Address

Mailing Address If Different:

Please provide proper documentation demonstrating your current participation in the program checked.

### Eligibility Requirements **Must Select At Least One**

I currently participate in or receive benefits from one of the following programs (Check all that apply).

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Low Income Home Energy Assistance Program | <input type="checkbox"/> Section 8                     | <input type="checkbox"/> Assistance Program           |
| <input type="checkbox"/> Temp Assistance To Needy Families         | <input type="checkbox"/> Medicaid                      | <input type="checkbox"/> Supplemental Security Income |
| <input type="checkbox"/> Fed Poverty Guidelines                    | <input type="checkbox"/> National School Lunch Program | <input type="checkbox"/> Food Stamps                  |

ATTENTION: Please verify your eligibility with the chart on the next page if you chose Federal Poverty Guidelines.

### CERTIFICATION SIGNATURE (PLEASE READ AND SIGN BELOW)

By signing below, I certify under penalty of perjury that the information contained within this application is true and correct and that I am head of my household. I also acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law and the penalties of perjury include monetary fines and potential imprisonment.

I understand that completion of this application does not constitute immediate approval for Conexión Wireless service. I authorize Conexión Wireless or its duly appointed representative to access any records (including financial records) required to verify my statements herein and to confirm my eligibility for Conexión Wireless service. I authorize social service agency representatives to discuss with and/or provide information to Conexión Wireless verifying my participation in public assistance programs that qualify me for Conexión Wireless service. I also authorize Conexión Wireless to release any records (including financial records) required for the administration of Conexión Wireless service.

I understand that I may be required to verify my continued eligibility for Conexión Wireless service at any time. Failure to verify eligibility will result in termination of Conexión Wireless service. In the future, if my total household income exceeds 135% of the federal poverty guidelines, or I am no longer eligible to receive benefits from at least one of the qualifying public assistance programs listed above, I will notify Conexión Wireless within five (5) days.

I agree to provide proper documentation demonstrating my current participation in the program selected.

I understand that Lifeline assistance is only available for one (1) landline or wireless phone line per household. If I currently have a Lifeline plan with a different service provider, I will notify my current provider when I am approved for Conexión Wireless service.

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE INFORMATION CONTAINED IN THIS APPLICATION IS TRUE AND CORRECT.

Signature

Date



Conexión Wireless  
P.O. Box 1630  
Melbourne, FL 32902

**URGENT - MUST RETURN ENTIRE  
PAGE FOR BENEFITS  
PLEASE DO NOT TEAR THIS FORM!**

Addressee:

Remit To:

CONEXION WIRELESS  
P.O. BOX 1630  
MELBOURNE, FL 32902

### Federal Poverty Guideline Chart

Check One	Persons in Household	Annual Income	Monthly Income
<input type="radio"/>	1	\$15,079	\$1,257
<input type="radio"/>	2	\$20,425	\$1,702
<input type="radio"/>	3	\$25,771	\$2,148
<input type="radio"/>	4	\$32,117	\$2,593
<input type="radio"/>	5	\$36,463	\$3,039
<input type="radio"/>	6	\$41,809	\$3,484
<input type="radio"/>	7	\$47,155	\$3,930
<input type="radio"/>	8	\$52,501	\$5,375
<input type="radio"/>	For each add'l person, add:	\$5,346	\$445

# URGENT - MUST RETURN FOR BENEFITS

## Maryland Lifeline Application Revised 04/20/12

Account Number: First Name: Last Name: M. Initial: Date Of Birth:  
Residential Address 1: Residential Address 2: Last 4 Of Social:  
City: State: MD Zip:

This is my (check one):

☐ Permanent Address ☐ Temporary Address

Mailing Address If Different:

Please provide proper documentation demonstrating your current participation in the program checked.

### Eligibility Requirements - **Must Select At Least One**

I currently participate in or receive benefits from one of the following programs (Check all that apply).

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Assistance Program                        | <input type="checkbox"/> Medicaid                                | <input type="checkbox"/> Maryland Energy Assistance Program |
| <input type="checkbox"/> Low Income Home Energy Assistance Program | <input type="checkbox"/> Temporary Cash Assistance               | <input type="checkbox"/> Temp Assistance To Needy Families  |
| <input type="checkbox"/> Section 8                                 | <input type="checkbox"/> Food Stamps                             | <input type="checkbox"/> Fed Poverty Guidelines             |
| <input type="checkbox"/> Electric Universal Assistance Program     | <input type="checkbox"/> Temporary Disability Assistance Program | <input type="checkbox"/> Supplemental Security Income       |
| <input type="checkbox"/> Public Assistance To Adults               | <input type="checkbox"/> National School Lunch Program           |   |

ATTENTION: Please verify your eligibility with the chart on the next page if you chose Federal Poverty Guidelines.

### CERTIFICATION SIGNATURE (PLEASE READ AND SIGN BELOW)

By signing below, I certify under penalty of perjury that the information contained within this application is true and correct and that I am head of my household. I also acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law and the penalties of perjury include monetary fines and potential imprisonment.

I understand that completion of this application does not constitute immediate approval for Conexión Wireless service. I authorize Conexión Wireless or its duly appointed representative to access any records (including financial records) required to verify my statements herein and to confirm my eligibility for Conexión Wireless service. I authorize social service agency representatives to discuss with and/or provide information to Conexión Wireless verifying my participation in public assistance programs that qualify me for Conexión Wireless service. I also authorize Conexión Wireless to release any records (including financial records) required for the administration of Conexión Wireless service.

I understand that I may be required to verify my continued eligibility for Conexión Wireless service at any time. Failure to verify eligibility will result in termination of Conexión Wireless service. In the future, if my total household income exceeds 135% of the federal poverty guidelines, or I am no longer eligible to receive benefits from at least one of the qualifying public assistance programs listed above, I will notify Conexión Wireless within five (5) days.

I agree to provide proper documentation demonstrating my current participation in the program selected.

I understand that Lifeline assistance is only available for one (1) landline or wireless phone line per household. If I currently have a Lifeline plan with a different service provider, I will notify my current provider when I am approved for Conexión Wireless service.

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE INFORMATION CONTAINED IN THIS APPLICATION IS TRUE AND CORRECT.

Signature

Date



Conexión Wireless  
P.O. Box 1630  
Melbourne, FL 32902

**URGENT - MUST RETURN ENTIRE  
PAGE FOR BENEFITS  
PLEASE DO NOT TEAR THIS FORM!**

Addressee:

Remit To:

CONEXION WIRELESS  
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### Federal Poverty Guideline Chart

Check One	Persons in Household	Annual Income	Monthly Income
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<input type="radio"/>	3	\$25,771	\$2,148
<input type="radio"/>	4	\$32,117	\$2,593
<input type="radio"/>	5	\$36,463	\$3,039
<input type="radio"/>	6	\$41,809	\$3,484
<input type="radio"/>	7	\$47,155	\$3,930
<input type="radio"/>	8	\$52,501	\$5,375
<input type="radio"/>	For each add'l person, add:	\$5,346	\$445



# URGENT - MUST RETURN FOR BENEFITS

West Virginia Lifeline Application Revised 04/20/12

Account Number: First Name: Last Name: M. Initial: Date Of Birth:  
Residential Address 1: Residential Address 2: Last 4 Of Social:  
City: State: WV Zip:

This is my (check one):

☐ Permanent Address ☐ Temporary Address

Mailing Address If Different:

Please provide proper documentation demonstrating your current participation in the program checked.

## Eligibility Requirements **Must Select At Least One**

I currently participate in or receive benefits from one of the following programs (Check all that apply).

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> National School Lunch Program             | <input type="checkbox"/> Fed Poverty Guidelines    | <input type="checkbox"/> Food Stamps                            |
| <input type="checkbox"/> Temp Assistance To Needy Families         | <input type="checkbox"/> TTANF                     | <input type="checkbox"/> Supplemental Security Income           |
| <input type="checkbox"/> Low Income Home Energy Assistance Program | <input type="checkbox"/> Emergency Assistance      | <input type="checkbox"/> WV Children's Health Insurance Program |
| <input type="checkbox"/> Medicaid                                  | <input type="checkbox"/> School Clothing Allowance | <input type="checkbox"/> Section 8                              |

ATTENTION: Please verify your eligibility with the chart on the next page if you chose Federal Poverty Guidelines.

## CERTIFICATION SIGNATURE (PLEASE READ AND SIGN BELOW)

By signing below, I certify under penalty of perjury that the information contained within this application is true and correct and that I am head of my household. I also acknowledge that providing false or fraudulent documentation in order to receive assistance is punishable by law and the penalties of perjury include monetary fines and potential imprisonment.

I understand that completion of this application does not constitute immediate approval for Conexión Wireless service. I authorize Conexión Wireless or its duly appointed representative to access any records (including financial records) required to verify my statements herein and to confirm my eligibility for Conexión Wireless service. I authorize social service agency representatives to discuss with and/or provide information to Conexión Wireless verifying my participation in public assistance programs that qualify me for Conexión Wireless service. I also authorize Conexión Wireless to release any records (including financial records) required for the administration of Conexión Wireless service.

I understand that I may be required to verify my continued eligibility for Conexión Wireless service at any time. Failure to verify eligibility will result in termination of Conexión Wireless service. In the future, if my total household income exceeds 135% of the federal poverty guidelines, or I am no longer eligible to receive benefits from at least one of the qualifying public assistance programs listed above, I will notify Conexión Wireless within five (5) days.

I agree to provide proper documentation demonstrating my current participation in the program selected.

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<input type="radio"/>	5	\$36,463	\$3,039
<input type="radio"/>	6	\$41,809	\$3,484
<input type="radio"/>	7	\$47,155	\$3,930
<input type="radio"/>	8	\$52,501	\$5,375
<input type="radio"/>	For each add'l person, add:	\$5,346	\$445

## Exhibit B



# FREE *Conexion* WIRELESS CELL PHONE

with MONTHLY VOICE/TEXT MINUTES  
& NATIONWIDE LONG DISTANCE

*If You Receive Government  
Assistance like SSI, Food Stamps  
& Medicaid, You Could Qualify  
for a Free Cell Phone with  
Free Monthly Minutes!*

NO MONTHLY BILL,  
CREDIT CHECK,  
CONTRACT OR ID  
REQUIRED!

**SIGN UP  
TODAY!**

Actual model may vary.

**CONEXIONWIRELESS.COM**  
**CALL NOW 877-771-RING**  
**(7464)**

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